

UNITED STATES DISTRICT COURT  
DISTRICT OF NEBRASKA

MARIA GUZMAN MORALES and	)	Case No. 8:08CV504
MAURICIO GUARJARDO, on behalf	)	
of themselves and all other similarly	)	
situated,	)	
	)	NOTICE OF WITHDRAWAL OF
Plaintiffs,	)	CONSENT TO JOIN COLLECTIVE
	)	ACTION
vs.	)	
	)	
FARMLAND FOODS, INC., a	)	
Delaware Corporation and subsidiary of	)	
Smithfield Foods,	)	
Defendant.	)	
_____	)	

**NOTICE**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

The following individual has indicated in writing to counsel for Plaintiff that he wishes to withdraw his consent to join this collective action:

**1. CAI HUYNH**

Attached as Exhibit A to this Notice is the Declaration of Carolyn H. Cottrell, attached to which is a true and correct copy of the Declaration of the Opt-In Plaintiff who wishes to withdraw his consent to join this collective action.

April 6, 2011

Respectfully submitted,

\_\_\_\_\_  
/s/ Carolyn H. Cottrell  
CAROLYN H. COTTRELL  
Attorneys for Plaintiffs and the Class

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Attorneys for Plaintiffs and the Class

**EXHIBIT A**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEBRASKA**

**MARIA GUZMAN MORALES and  
MAURICIO GUARJARDO, on behalf  
of themselves and all other similarly  
situated,**

**Plaintiffs,**

**vs.**

**FARMLAND FOODS, INC., a  
Delaware Corporation and subsidiary of  
Smithfield Foods,  
Defendant.**

**Case No. 8:08CV504**

**DECLARATION OF CAROLYN H.  
COTTRELL REGARDING THE  
TRANSLATION OF OPT-IN  
PLAINTIFF'S DECLARATION**

I, Carolyn H. Cottrell, declare as follows:

1. I am a partner in the law firm of Schneider Wallace Cottrell Brayton Knoecky LLP, attorneys of record in the instant action. I am an attorney duly licensed to practice law in the State of California, and I am a member in good standing of the State Bar of California. I am admitted to the United States District Courts for the Northern Eastern, Central and Southern Districts of California, and I am a member of the Bar of the United States Supreme Court.

2. Attached as Exhibit A is a true and correct copy of Cai Huynh's Declaration to withdraw his consent to join this collective action.

3. Attached as Exhibit B to this Declaration is a true and correct copy of Cai Huynh's Declaration, which served as the document that was translated into Vietnamese by a professional translation service.

I declare under penalty of perjury under the laws of the United States that the

foregoing is true and correct. Executed on 5th day of April, 2011.

April 6, 2011

Respectfully submitted,

/s/ Carolyn H. Cottrell  
CAROLYN H. COTTRELL

**EXHIBIT A**

**TÒA ÁN LIÊN BANG KHU VỰC  
ĐẶT TẠI NEBRASKA**

MARIA GUZMAN MORALES và  
MAURICIO GUARJARDO, thay mặt cho  
họ và tất cả những người trong tình trạng  
tương tự,

Số hồ sơ 8:08-cv-504

**LỜI TUYÊN BỐ CỦA  
Ông HUỖNH CAI**

Đương đơn,

kiện

FARMLAND FOODS, INC., Smithfield  
Foods tổng công ty và công ty con tại  
Delaware,

Bị đơn.

Tôi, Huỳnh Cai, xin tuyên bố nơi đây rằng:

1. Tôi trên 18 tuổi và tôi hoàn toàn tự tin để thực hiện lời tuyên bố này.
2. Tôi có kiến thức cá nhân về những dữ kiện nêu trong tuyên bố này, và những dữ kiện trong tuyên bố này là đúng sự thật.
3. Tôi cư ngụ tại Lincoln, Nebraska.
4. Tôi đã trình sự thỏa thuận tham dự vụ kiện trên đây với tư cách người đương đơn tự nguyện.
5. Sự thỏa thuận tham dự vào vụ kiện này của tôi đã được nộp tại tòa này.
6. Tôi không muốn là đương đơn trong vụ kiện này nữa, và tôi xin rút lại sự thỏa thuận tham dự trong vụ kiện.
7. Luật sư của tôi đã cho tôi biết rằng việc rút lại sự thỏa thuận sẽ dẫn đến sự hủy bỏ tất cả những thỉnh cầu của tôi.

Tôi xin thề, dưới hình phạt cho tội khai man theo luật pháp Hoa Kỳ, rằng những lời khai trên đây là đúng sự thật. Được thực hiện vào ngày 6 tháng Ba, 2011, tại Lincoln, Nebraska.

  
Huỳnh Cai

**THÔNG BÁO RÚT ĐƠN KIỆN**

**EXHIBIT B**



**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

MARIA GUZMAN MORALES and  
MAURICIO GUARJARDO, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

FARMLAND FOODS, INC., a Delaware  
Corporation and subsidiary of Smithfield  
Foods,

Defendant.

Case No. 8:08-cv-504

**DECLARATION OF  
HUYNH CAI**

I, Huynh Cai, hereby declare:

1. I am over 18 years of age and am fully competent to make this declaration.
2. I have personal knowledge of the facts stated in this declaration, and the facts in this declaration are true and correct.
3. I reside in Lincoln, Nebraska.
4. I submitted a consent to join the above captioned lawsuit as an opt-in plaintiff.
5. My consent to join this lawsuit was filed with this Court.
6. I no longer wish to be a plaintiff in this lawsuit, and I would like to withdraw my consent to join this action.
7. My attorneys have advised me that withdrawal of my consent will result in the dismissal of all of my claims.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on \_\_\_\_ of March, 2011 at Lincoln, Nebraska.

\_\_\_\_\_  
Huynh Cai

NOTICE OF WITHDRAWAL